

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TRUSTIVO, LLC)	
)	
PLAINTIFF)	
)	
v.)	
)	
INTEGRATED BEHAVIORAL)	DOCKET NO. 15-11470-IT
HEALTH INC. d/b/a INTEGRATED)	
BEHAVIORAL HEALTH)	
INCORPORATED)	
)	
and)	
RELIANT BEHAVIORAL)	
HEALTH, LLC d/b/a RELIANT)	
BEHAVIORAL HEALTH)	
CORPORATION)	
)	
DEFENDANTS)	
)	
AND RELATED COUNTERCLAIMS)	
)	

**JOINT MOTION TO AMEND SCHEDULING ORDER
AND RESCHEDULE STATUS CONFERENCE**

The parties, Trustivo, LLC (“Trustivo”), Integrated Behavioral Health, Inc. (“IBH”) and Reliant Behavioral Health, LLC (“RBH”) hereby request that the August 11, 2015 Scheduling Order (“Scheduling Order”) be amended to extend all deadlines by sixty (60) days and to reschedule the status conference currently scheduled for February 10, 2015. As grounds for this motion the parties state as follows:

1. The Scheduling Order establishes the following deadlines:
 - A. *Amendments to Pleadings.* Motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed by December 1, 2015.
 - B. *Fact Discovery - Interim Deadlines.*

- a. All requests for production of documents and interrogatories must be served by January 7, 2016.
 - b. All requests for admission must be served by January 7, 2016.
 - c. All depositions, other than expert depositions, must be completed by *February 7, 2016*.
 - C. *Fact Discovery - Final Deadline*. All discovery, other than expert discovery, must be completed by February 7, 2016.
 - D. *Status Conference*. A status conference will be held on February 9, 2016, at 2:30 p.m. [Since rescheduled to February 10, at 2:30 p.m.]
2. Since approximately the middle of October the parties have explored the possibility of settlement through mediation, and toward that end, scheduled and participated in a mediation session before JAMS on November 19, 2015. Although the parties did not reach a settlement on November 19, 2015, the parties have continued exploring settlement with the participation of the mediator and have reached a tentative settlement that requires the parties to meet in California in December in order to finalize the terms of the settlement.
3. Since the Scheduling Order was entered and while the planned mediation was pending, the parties exchanged written discovery but delayed in conducting depositions and discovery related motions.
4. Accordingly, the parties wish to extend all deadlines in order to permit the parties to continue to attempt to settle the matter. The parties therefore request that the Scheduling Order be amended to establish the deadlines set forth below and to reschedule the status conference to a date to be set by the Court:

- D. *Amendments to Pleadings*. February 1, 2016.
- E. *Fact Discovery - Interim Deadlines*.
 - a. All requests for production of documents and interrogatories must be served by March 7, 2016.
 - b. All requests for admission must be served by March 7, 2016.
 - c. All depositions, other than expert depositions, must be completed by *April 7, 2016*.
 - d. *Fact Discovery - Final Deadline*. All discovery, other than expert discovery, must be completed by April 7, 2016.
- F. *Status Conference*. A status conference to be held on a date set by the Court.

5. Allowance of this motion will facilitate the full and fair adjudication of the matter and will not interfere with the timely and efficient disposition of the matter.

For TRUSTIVO, LLC

/s/ Timothy M. Hughes

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For INTEGRATED BEHAVIORAL
HEALTH, INC. and RELIANT
BEHAVIORAL HEALTH LLC

/s/ J. Christopher Jaczko
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Dated:

IT IS SO ORDERED.

DATED: _____

Honorable Indira Talwani
UNITED STATES DISTRICT JUDGE